

WILMERHALE

October 28, 2021

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VIA ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *Carfora et al. v. Teachers Insurance and Annuity Association of America et al.*
No. 1:21-cv-08384 (PKC)**

To the Honorable P. Kevin Castel:

We have recently been retained to represent defendants Teachers Insurance and Annuity Association of America and TIAA-CREF Individual & Institutional Services, LLC (together, "TIAA") in the above-captioned case. Pursuant to Rule 1.B of Your Honor's Individual Practices, we respectfully request an extension of time to evaluate and respond to the claims and allegations in Plaintiffs' complaint. Plaintiffs served TIAA on October 15, 2021, and TIAA's response is currently due on November 5, 2021. We request a 24-day extension to and including November 29, 2021 to file a pre-motion letter that will discuss our proposed motion to dismiss. There have been no previous requests for an extension of time and no date has been set for the initial pretrial conference or any other conferences.

Plaintiffs consent to the proposed extension. In the event that the Court authorizes Defendants to proceed with the motion, the parties will, as required by the Court's rules, submit a proposed schedule for the motion.

Thank you for your consideration.

Respectfully Submitted,

Lori A. Martin

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cc: All Counsel of Record by ECF

*Time to answer
or submit pre-motion letter
is extended to
November 29 for all
defendants.*
SO ORDERED
[Signature]
10-28-21